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Attorneys for Defendant

HANSEN LAW FIRM, P.C.; CRAIG HANSEN; and STEPHEN HOLMES

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

ABRAHAM ABITTAN, RACHEL
ABITTAN, BRIAN ABITTAN, JACOB
ABITTAN, ALYSSA PORTAL, ELIANA
ABITTAN, ROY GRABER, and TOVA
GRABER,

Plaintiff(s),

v.

HANSEN LAW FIRM, P.C., CRAIG
HANSEN, STEPHEN HOLMES, SAC
ATTORNEYS LLP, JAMES CAI, BRIAN
BARNHORST, PATRICK
O'SHAUGNESSY, YE & ASSOCIATES,
PLLC, JINGJING YE, and DOES 1-20,
inclusive,

Defendant(s).

Case No.: 5:25-cv-5427-SVK

***ASSIGNED TO: MAGISTRATE JUDGE
SUSAN VAN KEULEN***

**FIRST STIPULATION AND
[PROPOSED] ORDER TO ENLARGE
TIME FOR DEFENDANTS HANSEN
LAW FIRM, P.C.; CRAIG HANSEN;
AND STEPHEN HOLMES
TO RESPOND TO THE COMPLAINT**

(L.R. 6-1(b))

Complaint Filed: June 27, 2025
Trial Date: None Set

1 **STIPULATION**

2 Pursuant to Civil Local Rule 6-1(b), counsel for Plaintiffs Abraham Abittan, Rachel
3 Abittan, Brian Abittan, Jacob Abittan, Alyssa Portal, Eliana Abittan, Roy Graber, and Tova Graber
4 (“Plaintiffs”); and Defendants Hansen Law Firm, P.C., Craig Hansen, and Stephen Holmes
5 (“Defendants”), by and through their counsel of record, hereby stipulate to the following:

6 WHEREAS, on June 27, 2025, Plaintiffs filed a Complaint in this action (the “Complaint”);

7 WHEREAS, on September 25, 2025, Plaintiffs filed a Proof of Service of Summons
8 showing substituted service on Hansen Law Firm, P.C. on September 10, 2025 and mailing on
9 September 11, 2025;

10 WHEREAS, Plaintiffs and Defendants agree, that based upon the date of substituted
11 service on Hansen Law Firm, P.C., its deadline to respond to the Complaint is October 14, 2025;

12 WHEREAS, on September 25, 2025, Plaintiffs filed a Proof of Service of Summons
13 showing substituted service on Stephen Holmes on September 12, 2025 and mailing on September
14 16, 2025;

15 WHEREAS, Plaintiffs and Defendants agree, that based upon the date of substituted
16 service on Stephen Holmes, his deadline to respond to the Complaint is October 17, 2025;

17 WHEREAS, on October 8, 2025, this Court issued an Order re Service and Default Status
18 (Dkt. 24) stating the deadline for Defendants, with the exception of Craig Hansen, to respond to
19 the Complaint as October 3, 2025, and directing Plaintiffs to enter default or file a status report as
20 to why they have not taken Defendants’ default by October 15, 2025;

21 WHEREAS, Plaintiffs and Defendants have met and conferred and have agreed to enlarge
22 the deadline for Hansen Law Firm, P.C. to respond to the Complaint to October 17, 2025 to
23 coincide with Stephen Holmes’ deadline to respond;

24 WHEREAS, Plaintiffs and Defendants have met and conferred and have agreed to set the
25 deadline for Defendant Craig Hansen to respond to coincide with Stephen Holmes’ deadline to
26 respond, October 17, 2025;

27 THEREFORE, IT IS SO STIPULATED, THROUGH THEIR RESPECTIVE COUNSEL
28 OF RECORD that Defendants shall respond to the Complaint by October 17, 2025 and Plaintiffs

are relieved from moving for entry of default against Defendants and from filing a status report explaining why they have not taken Defendants' default by October 15, 2025.

IT IS SO STIPULATED.

Dated: October 10, 2025

BELLATRIX LAW, P.C.

By: /s/ Brianna K. Pierce

Brianna K. Pierce
Attorneys for Plaintiffs
ABRAHAM ABITTAN, RACHEL
ABITTAN, BRIAN ABITTAN, JACOB
ABITTAN, ALYSSA PORTAL,
ELIANA ABITTAN, ROY GRABER,
and TOVA GRABER

Dated: October 10, 2025

WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP

By: /s/ Peter C. Catalanotti

Peter C. Catalanotti
Audrey Tam
Stephanie Yee
Attorneys for Defendants
HANSEN LAW FIRM, P.C.; CRAIG
HANSEN; and STEPHEN HOLMES

[PROPOSED] ORDER

Pursuant to the foregoing Stipulation, and good cause appearing therefor, IT IS ORDERED that:

1. Defendants' deadline to respond to the Complaint is enlarged to October 17, 2025; and
2. Plaintiffs are relieved from moving for entry of default against Defendants and from filing a status report explaining why they have not taken Defendants' default by October 15, 2025.

Dated: _____

Hon. Judge Susan van Keulen
United States Magistrate Judge

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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Peter C. Catalanotti, hereby attest that each of the other signatories have concurred in the filing of this document and have consented to the application of their electronic signatures to this document, which shall serve in lieu of their holographic signatures on the document. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 10, 2025, at San Francisco, California.

By: /s/ Peter C. Catalanotti
Peter C. Catalanotti

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At the time of service I was over 18 years of age and not a party to this action. I am employed by Wilson, Elser, Moskowitz, Edelman & Dicker LLP in the County of San Francisco, State of California. My business address is 655 Montgomery Street, Suite 900, San Francisco, California 94111. My business Facsimile number is (415) 434-1370. On this date I served the following document(s):

on the person or persons listed below, through their respective attorneys of record in this action, by placing true copies thereof in sealed envelopes or packages addressed as shown below by the following means of service:

SEE ATTACHED SERVICE LIST

EXECUTED on October 10, 2025, at San Francisco, California.

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FIRST STIPULATION AND [PROPOSED] ORDER TO ENLARGE TIME FOR DEFENDANTS HANSEN LAW FIRM, P.C.; CRAIG HANSEN; AND STEPHEN HOLMES TO RESPOND TO THE COMPLAINT

SERVICE LIST

Abittan, Abraham v. Hansen Law Firm, PC, et al.
United States District Court Case No. 5:25-cv-5427

<p>Brianna K. Pierce (SBN 336906) BELLATRIX LAW, P.C. 16868 Via Del Campo Ct., Ste 100 San Diego, California 92127 Telephone: (858) 338-5650 Email: bkp@bellatrix-law.com</p> <p><i>Attorneys for Plaintiffs,</i> Abraham Abittan, Rachel Abittan, Brian Abittan, Jacob Abittan, Alyssa Portal, Eliana Abittan, Roy Graber, and Tova Graber</p>	<p>Bruce Douglas MacLeod DAVIS, BENGTON & YOUNG 1960 The Alameda Ste 210 95126 San Jose, CA 95126 669-288-6727 Fax: 408-985-1814 Email: bmacleod@dbj-law.com</p> <p><i>Attorneys for Defendants, SAC Attorneys LLP, James Cai, Brian Barnhorst, Patrick O'Shaugnessy</i></p>
<p>Jingjing Ye Bennett YE & ASSOCIATES, P.C. 3400 N Central Expy Suite 110-321 Richardson, TX 75080 469-410-5232 Fax: 469-751-5507 Email: jye@yefirm.com</p> <p><i>Attorneys for Defendants,</i> Ye & Associates PLLC and Jingjing Ye Bennett</p>	